

From: [Taylor Carsley](#)
To: [Wr401program](#)
Cc: [Kylie Heriford](#)
Subject: Lower Klamath Project DEIR Comment Letter - Del Norte County
Date: Tuesday, February 26, 2019 9:02:00 AM
Attachments: [Del Norte County Lower Klamath Project Comment Letter.pdf](#)

Hello,

Please see attached for the comment letter for the Lower Klamath License Surrender on behalf of the Del Norte County Board of Supervisors.

Thank you.

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COUNTY OF DEL NORTE BOARD OF SUPERVISORS

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Ms. Michelle Siebal
State Water Resources Control Board
Division of Water Rights – Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000

Re: Lower Klamath Project License Surrender

Dear Ms. Siebal,

The Del Norte County Board of Supervisors (Board) wishes to provide comment on the Lower Klamath Project License Surrender (Project) and the Draft EIR released by the State Water Resources Control Board (SWRCB). The Klamath River is a key part of the economy, culture, and natural environment of Del Norte County; where the river meets the Pacific Ocean. The Board is responsible for ensuring projects affecting the County contribute to the health and welfare of the community and the local economy. While the Board supports the recovery of Klamath River and Pacific Ocean commercial and recreational fisheries, we do have significant concerns with regard to how the Project may exacerbate the issue of siltation and sedimentation at the Crescent City Harbor, located 15 miles north of the river mouth. Also concerning are the known unavoidable and significant impacts to oceanic and riverine fisheries resources that are so essential to our local commercial and sport-fishing industries.

The Draft EIR (DEIR) is clear that the proposed project will increase suspended materials to a high degree following the drawdown and dam removal phases. For example, suspended sediment concentrations (SSCs) would potentially increase 220 times the threshold of significance downstream of Copco No. 1 Dam upon drawdown with similar numbers projected for the drawdown of the other dams in California. The Board is concerned with the fact that the quantity of sediment delivered to the Pacific Ocean is still not known with certainty, and more importantly, how the material will react once delivered to the ocean. Conservative estimates place the amount of sediment discharge to the ocean as a result of drawdown and

dam removal at about 5.8 million tons (4 million tons of fine sediment and 1.8 million tons of sand and larger sediment). While the DEIR estimates that the quantity released would be similar to that transported by the river to the ocean in a year with average flow, this quantity would be in addition to what is transported naturally by the river, whether it be a dry, average, or wet year. On the year of dam removal and drawdown, a significant amount of sediment will be delivered to the ocean, relative to any year without the project. Recognizing the uncertainty on where the material will settle in the ocean, it is known that normal ocean currents transport material north and there is certainty that our Harbor already has issues with dredging and dredge spoils management.

The Crescent City Harbor District is designated a "harbor of safe refuge" by the California Harbors and Navigation Code. The Harbor supports a U.S. Coast Guard cutter, commercial and sport fishing, waterfront industry, and recreational activities. A study titled "Coastal Geomorphology of the Smith River Plain" (Roberts and Dolan, 1968) found that the littoral current pattern south of Crescent City transports sediment northwestward and contributes to a continued seaward growth of sand south of the breakwater at the mouth of the Harbor. Sediment accumulating at the entrance of the Harbor travels inward and requires regular dredging to maintain a safe navigation depth of recreational and commercial vessels in the federal channels and inner boat basins. Fine sediment accumulation is particularly problematic because is typically unsuitable for use as beach replenishment and thus more difficult to dispose of. The Harbor District's dredge materials holding site is currently at capacity and a feasible replacement site has not yet been established; complicated by the permitting hurdles between the U.S. Army Corps of Engineers and the California Coastal Commission which are less than amenable toward achieving maintenance dredging in the first place. The Harbor faces incredible challenges with managing the current amount of siltation experienced in and around its facilities, let alone potentially more as a result of the Project. Even if a very small percentage of project sedimentation impacts the Harbor, the issue could be compounded in a way that severely hampers the essential marine operations of the County. It follows that the Board needs the guarantee from the Project coalition that we will be actively supported in our efforts to acquire the necessary permits to dredge our Harbor, as these are probable future projects whose impacts must be considered cumulatively. (14 C.C.R. 15064(g).) Only by assisting the County in our ability to dredge the Harbor will the potential for impacts as a result of the Project be mitigated.

Recreational and commercial fishing is an economic lifeline for many members of Del Norte County, where the per capita median income is below state average. Guided recreational fishing and the tourism dollars that this fishery supports make meaningful and significant impacts to our local economy. For example, we estimate that the spring-run fishery, most likely to be affected by the Project, generates close to \$521,000 in revenue to our communities.

Losses in revenue of our local hospitality, restaurant, hotel, and service sector industries, not to mention licensed river guides as a result of impacts from the Project is unacceptable. The DEIR paints an optimistic picture of limited short-term impacts to anadromous fisheries as a result of the Project, and predicts significant long-term beneficial economic impacts on the coastal commercial fishing industry. But the DEIR fails to consider the short-term economic impacts that a lost year will have on the county's half-million dollar industry. Indeed, the DEIR acknowledges the short term impact that increased turbidity will have on recreators—and dismisses these impacts as temporary—but fails to consider the associated economic impacts that decreased recreation will have on tourism. (14 C.C.R. §15131.) Those impacts, even if temporary, should be considered significant to Del Norte County's economy, and specific funding mechanisms to mitigate those impacts should be included in the project. (14 C.C.R. §15123.4.) It is understood that substantial funding is available for the offset of unavoidable impacts to spring- and fall-run fisheries. The Board requests that a portion of funding be set aside and made available to our community that relies on these dwindling fisheries, already under pressure for special status listing from resource agencies. We simply cannot afford to mitigate the impacts associated with increased pressure on commercial and sport fisheries without financial assistance from the Project's coalition.

While this Board can recognize certain long-term benefits of the Project, and a recent meeting with representatives from both the Klamath River Renewal Corporation (KRRC) and the Pacific Coast Federation of Fishermen's Associations (PCFFA) was reassuring, the potential impacts of siltation and sedimentation still exist and could have real impacts on the economy and livelihood of the County. Impact assessment for sedimentation on the nearshore ocean environment is lacking in the DEIR, and the results of the modelling lead to much uncertainty. The Board would be much more at ease should the project contain a plan that provides for the potential negative contingencies. If assurances could be made that impacts to our County would be directly mitigated, a more thorough level of support would be provided. One solution could be provided in the form of a fund established for monitoring and remediation of short and long-term impacts resulting from Project implementation. It has been acknowledged that KRRC has ample resources assist with these necessary contingencies through PacifiCorp customer surcharges and California Proposition 1 water bonds. Funding for the mitigation of impacts is worth very little, however, if they are not made readily available as needed. An efficient mechanism to distribute resources that alleviate the adverse effects of the project needs to be included in the DEIR. This would ensure that the SWRCB truly has a worst case scenario in mind and is willing to address the impacts of this scenario if it does indeed affect our local community in the short or long-term.

We hope that our Board's concerns are considered seriously in the evaluation of and response to DEIR comments. Further, we press that in the process of preparing findings on the feasibility of reducing and limiting potential significant environmental impacts, appropriate mitigation and monitoring is examined that addresses the issues that have been raised. It is with enthusiasm that we would support this Project if the proper mitigation funding, resources, and access to them were made available in the event that future impacts to the Crescent City Harbor and our commercial and sport-fishing industries are more severe than the DEIR makes them out to be. Thank you for the consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lori L. Cowan', written over a horizontal line.

Lori L. Cowan, Chair

Del Norte County Board of Supervisors